to go through and just get your response.

One of them is for two-wire digital loop Tech Pub 76750. Is that being utilized?

MR. SMITH: Mel Smith. No, it's not. That one and 76740 and 76730 were deactivated once the FCC made the ruling that we could not apply our own technical standards to DSL and for CLECs to comply with them. Those were deactivated, and all references to them were, I believe, taken out of this 76 TX.

MS. MALONE: Let's go off the record for a second.

(Recess: 1:27 p.m. to 1:30 p.m.)

MS. MALONE: We'll go back on the record. I just want to confirm, as far as DSL in my DSL implementation docket hat, that Southwestern Bell is seeking approval of Tech Pub 76625 and 76860. Those are the only two technical publications regarding DSL that are being used and implemented by Southwestern Bell.

MR. SMITH: Mel Smith. Actually, TP 76625 does not address DSL. It's DS1 and DS3.

MS. MALONE: But it's specifically referenced in Tech Pub 76860.

MR. SMITH: Yes, for the DS1 loop, UNE loop, which is a repeater T1 UNE Loop, not a DSL loop.

MS. MALONE: Okay. In a more broad scope of technical publications under Project 4000 (sic) in Section 2.17.1 of Attachment 6 UNE of the T2A, Southwestern Bell is required to file its technical publications with the Commission and seek approval of those. Has Southwestern Bell filed any technical publications for approval?

MR. LEAHY: Other than these, no. Tim Leahy, Southwestern Bell.

MS. MALONE: Are there other technical publications other than the two previously identified that would need to be approved that are currently being used by Southwestern Bell Telephone?

MR. SMITH: Mel Smith, none that are being used. I've created one for line sharing and I was just waiting to get the details on the process of flowing it to the Commission before I forwarded it on to you for approval. But it's only on my PC.

MR. SRINIVASA: How about Pronto,

you know, the transport ATM cells? Are you using any technical publication standards for those? Are you going to file here for approval as part of Project 20400?

MR. SMITH: Mel Smith. I'm not aware of any technical pubs that have been created for Project Pronto. I personally don't work on that project. When we provide a UNE offering, then I expect to update this tech pub with it.

MR. SRINIVASA: How about for all the T2A? You do have transports which although C levels and DS1s through DS3, and there are other unbundled network elements that you're providing and technical publications for those need to be approved. To the extent that it's not the same as Bellcore standard or ANSI standard, if it is something specific that's used by Southwestern Bell such as your TP designation, then you need to file that for approval by the Commission, or even -- if you reference to a TR, a Bellcore document or an ANSI document, you need to -- exactly like you have done in here, you need to do the reference numbers in those TP documents for other UNEs.

MR. SMITH: Okay.

MR. SRINIVASA: Because that's required under T2A.

MR. SMITH: Mel Smith. Does that include internal MNP documents or just technical documents that are to be shared with the CLEC community?

MR. SRINIVASA: That are to be shared with the CLEC community.

MR. SMITH: Okay.

MR. SIEGEL: Question. On Pronto tech pub that, Judge Srinivasa, you just referenced, just to make clear, even there is debate on whether it's a (inaudible) service. I think regardless of how that debate goes, you want that tech pub for approval.

MR. LEAHY: And I think we made -- Mr. Smith made clear that he's working on a document. There's no -- there is no such -- there's nothing final, nothing even a final draft. He's trying to create a document in anticipation of some of these issues, perhaps.

MR. SRINIVASA: Okay.

MS. MALONE: Have any technical publications been approved by the FCC?

MR. SMITH: Mel Smith, not to my knowledge.

MR. SRINIVASA: How about the network interface devices? The same FCC standards that you're using -- those are standard interface devices, right, at the customer premise are --

MR. LEAHY: Oh, okay. I'm not aware -- you're talking about CPE or are you talking about the NID?

MR. SRINIVASA: Interface devices.

MR. LEAHY: I don't know. I would -- wouldn't the manufacturer get that approved?

MR. SRINIVASA: Sometimes they do. Yeah, most of them are approved. Manufacturers will have to get an approval. And if there are some proprietary interfaces that you're installing, you have your own, then you would have to provide the standards to the CLEC if they need to connect at that point.

To the extent you're using standard FCC-approved interfaces, it's available to them, too, just like it is to you.

MR. LEAHY: Right.

MR. SRINIVASA: If it is something you are using on your own, proprietary type, then you would have to provide it.

MR. LEAHY: Based upon information and I believe my experience is that the SBC family of companies -- we don't manufacture devices, so what we acquire would come from manufacturers who -- I would believe that we wouldn't acquire such devices until they received necessary approval.

MR. SRINIVASA: To the extent it is -- you know, the manufacturer has already got an FCC approval or some other standard making body's approval for that type interface, you would reference to that. That reference -- if you make that reference available to CLECs, CLECs can look it up also.

But if you have some proprietary thing that is custom manufactured just for you, hasn't gone through FCC, then they need to know what it is.

MR. SMITH: Mel Smith. Well, our policy is to use only the FCC-approved or industry standard body approved devices.

MR. SRINIVASA: To the extent you

do that, then it's no problem. If it is, then you have to -- if you have any equipment that's proprietary.

MR. SMITH: Okay.

MS. MALONE: Okay. Then I will request that Southwestern Bell file a revised tech pub. That's for both 76860 TX and 76625. I looked over 76625, and a lot of the comments that I had about 76860 would apply to 76625 in terms of updating the references, adding the language saying you reserve the right subject to, you know, insert the exception here. So if you could look at those and sort of anticipate our concerns, that would be most helpful.

If you could file both of those and any other technical publications should some become effective and implemented and applicable between now and then on August 9th, that gives you about a week and a half of. Is that enough time?

MR. SMITH: Yes.

MS. MALONE: Okay. And then we will, again, give the CLECs a comment period to respond to both of those tech pubs, and we ask that comments be filed on August 16th. And all

of these filings should be in both dockets, Project 20400 and Project 21165 so that all parties receive adequate notice.

MR. LEAHY: Yes, Your Honor, Tim Leahy for Southwestern Bell. To the extent that what we've previously filed is voluminous, would it be possible that we work with the CLECs and have them send e-mails. To the extent that they want this document, we'll give that to them, put out a notice to that effect, but, frankly, the volume is such that if we provide notice to every participant in 20400 -- there's 50 boxes like this.

MS. MALONE: The tech pub itself?

MR. LEAHY: Not the tech pub, but it has the attachments. You don't want --

MS. MALONE: No, I don't need the attachments anymore, just the actual document.

MR. RAJAGOPAL: Just this and this.

MR. LEAHY: Okay.

MS. MALONE: I have ample attachments now.

To the extent that there are any oral comments today, we can go ahead and take those

quickly. But keep in mind you'll have the opportunity to submit written comments at a later date. Are there any comments?

MR. GOODPASTOR: I just had a couple, and this will be included in written comments to the extent that it doesn't change in the refiling. Chris Goodpastor for Covad.

If you look at TP 6860 Texas, I believe it's on Page 14 -- well, Page 13 -- actually, it begins on Page 12 of the tech pub or Page 22 of the filing -- Southwestern Bell appears to be offering what's called an IDSL capable loop. Later on in the tech pub it also offers an ISDN capable loop, or I think they just call it a two-wire digital loop.

In Covad's interconnection agreement Southwestern Bell has agreed to provide IS -- basically, a two-wire digital loop, ISDN compliant, that we can use for IDSL. In this forum and in the past, we've had some disagreements about provisioning problems that Southwestern Bell has had with this loop in provisioning IDSL. Covad's contention is that if they provision a loop that complied with the Bellcore standards for ISDN, then they wouldn't

have a problem. We believe it's a bug in their DLC systems. That is their responsibility. They believe that something different should occur.

What I'm concerned about is the introduction of an IDSL UNE that will result in different rates and different performance standards from what we have in our contract. And so at this point, I mean, I'm not sure if this is intended or not, I'm not making any accusations, but the way this reads it appears that it's another way to approach the issue that is yet unresolved between at least Covad and Southwestern Bell regarding provisioning of IDSL. And so I just want to bring that to the Commission's attention and we'll be addressing this more fully in our comments.

MS. CHAPMAN: I can comment if you would like. This is Carol Chapman. We are developing a new IDSL capable loop product. It will be available. When we have it fully developed, we'll make that available to you. The CLECs will still be able to order the two-wire digital loop that we already have, but this will be another loop offering that is

specifically tailored to IDSL, and that is what this was intended to capture was what was parameters around that offering.

It's not available yet because we haven't rolled it out yet.

MS. MALONE: Are there any other comments?

Okay. We'll move on to the next issue. We'll go off the record for a second.

MR. MASON: Let's take five minutes, and we will start up with IP's issues first.

(Recess: 2:23 p.m. to 2:30 p.m.)

MR. MASON: On the record. We're back, and we will now get into the list of issues. I will first -- we can first talk about IP's issues since they were timely filed. Thank you very much. And the first one is conditioning charges. I don't know if -- does everyone have a copy of these list of issues so it will be easy to address?

The easiest thing from past forums has just been to kind of go down the list, and then if anybody has any clarification questions we can do that. So why don't we start with A, and

I'll ask whoever is most appropriate to address that to address it.

MR. WELCH: My name is Mark Welch. The question is regarding if SBC has a policy to proactively delead or remove -- it says remove loops within a binder group. I don't know -- really know the context of removing loops.

MS. GENTRY: It's loads. It's a typo.

MR. WELCH: Loads, okay. Removing the loads from a -- removing the loads can occur on a couple of different ways. As far as proactively, we don't have a policy to just go out and send technicians out to proactively deload cables across the 13-state region. There is no such project or policy.

There are times when we do have to remove loads, as you know. It could be that -- first, I think it's important to realize that loads are put on cable when you're trying to serve someone beyond 18,000 feet from the central office. So if you were to use that as a feeder for a remote terminal, the remote terminal couldn't have loads on that pair, so you would have to go out and deload the pair

that's going to feed that remote terminal unit.

There are certain retail services like ISDN that don't work with load coils on there. So you would have to go out and actually remove the load coils for those. CLEC requests for the two-wire digital or four-wire digital circuits as well as the DSL capable services. So the bottom line is there are certain times that you do have to remove the loads, but, again, there is no policy of going out and just sending technicians out into the field to get into plant when we don't have a need to be doing something in that copper facility.

MS. GENTRY: Let me see if I can clarify where my intent was. It's going back to past discussions we've had here in the room, and Mike Bellomy spoke to some of those before, but I either did not hear him clearly, or by the time it got to the Friday SBC-sponsored loop qual discussion, it was not clearly stated.

What I'm trying to find out is -- let me give you an illustration. I as a CLEC request load coils taken off a specific loop. That binder group's length is one that the furthest loop is less than 18k. So nothing in

that binder group would need to be loaded by current standards, by CSA standards.

When they take the loads off of the specific customer I'm requesting, what are the conditions that they proactively deload the rest of the 25 binder group? Because I believe that Mike Bellomy a few weeks ago told us that when they can they do.

What then was said in a different forum was only -- and then there are all these caveats that got thrown behind it which totally muddied the water about how proactively you're cleaning up your plant. Because if you're out there already, it's an incremental time to go ahead and clean up additional ones which serves everyone's purpose in the long-run.

I was hoping to hear that that was part of a practice or when is it, and that's the criteria I'm looking to have understand.

MR. MASON: Just to think about and I guess one follow-up question, is there any -- in that circumstance, would there be any situations where you would affect another -- you wouldn't want to do that. I'm just trying to weigh -- I don't know.

MR. WELCH: I think that that -- I mean, in the very specific circumstance that Jo raises to me makes me think that we have a copper pair that has gone out beyond 18,000 feet and for some reason we've cut that entire copper pair off.

Traditionally, that's not what's going to happen. If the facility never went beyond 18,000 feet, the engineer wouldn't have put loads on the copper facility.

MS. GENTRY: You've had significant rearrangements through the years, outside plant rearrangements.

MR. WELCH: Correct. Correct.

MS. GENTRY: I also know historically that there have always been some very conservative technicians that did load things under 18 feet -- 18,000 feet in the industry. If you don't want to admit that SBC does, then tell me you've never, never done that, and I will feel good.

I know with my history at US West they will tell you that there were very conservative engineers that did load under 18,000 feet or that you've had significant plant rearrangement,

and what the loops were at one time they were loaded. They now are under 18,000 feet; they don't need to be loaded. And, again, my frame of reference is another ILEC who has proactively -- when they're there, they clean up the plant because they know it takes incrementally more minutes, but it is better for everyone concerned.

I'm trying to find out if SBC has that when the binder group you're in is no longer than 18,000 feet, up to that, are you proactively and what are the circumstances you're doing it?

MR. WELCH: I think that the answer again is that we don't have a policy that says these are the guidelines that the engineer will use every single time. We rely on our engineers to use sound engineering judgment. If they're looking at this facility and they're engineering at a request of a wholesale customer or a retail customer and they're in that facility, they're going to look at the forecast of services that they think they're going to provide across that entire facility.

If they think there's an opportunity

that they're going to have to use that facility to provide a service that requires the loads, then they're going to have to look at the forecast and say how many are going to require loads versus how many may not require loads and use their engineering judgment to decide what they're going to do going forward.

But as far as a 13-state policy, there just isn't anything that is like that. We rely on the actual engineers.

MS. GENTRY: Your illustration back to me was when you would need to be loaded. Go with the concept it's under 18,000 feet. There's never a circumstance that you need to load something under 18k by CSA standards. So with that said -- and again, I think you're trying to tell me you have no policy, you have no criteria, you don't do it, and if it happens to get done it's a wonderful accident. If that is what it is, I was just trying to see if we had any proactive cleaning of the plant.

MR. WELCH: Do you want to add something?

MR. BELLOMY: Mike Bellomy with Southwestern Bell, and I did answer that

original question. And I went back to verify what we have done in Texas and where we are, and we found that the plant in Texas was built, that there effectively are no loads less than 18,000 feet. If the engineer at the request of the CLEC does go in and look at the plant to see what the plant looks like, then if they should find a load -- and there are situations where they may have found that a particular cable was loaded -- if they do find a load, they do look at the entire complement of that.

But we have not found in Texas an occasion to go in and deload everything. We have found just a few loaded situations, and, in that case, typically, it was a much longer cable and they could not remove all of the loads for DSL because those loads were placed there to provide the POTS service. And if they were to remove them, then we lose the capability of POTS service beyond that 18k feet.

So in Texas, we did not go in and remove the entire complement.

MR. SRINIVASA: Cable route, you know, you are serving a cluster of subscribers. Some are 15,000 feet, 16,000 feet, 18,000,

18,500, 18,900. You can go on. It's all the same cable pair. You're extending them out. So do you look at anyone who is beyond that and only on those pairs you add the load coils? It's all the same bundle, cable bundle. It's a cable route.

MR. WELCH: Again, I think the answer to that is that the cable route goes out, and then you're going to taper it and you're going to do different things as a part of engineering. So to say that you do the same thing to the entire 500 -- 1200 pair cable, I don't know that that's necessarily what we're saying because it's going to taper in certain places, and certain things are going to happen.

But to the extent that a cable does go beyond -- is to serve the customers beyond 18,000 feet, yes, we would load everything to go out there because we want the flexibility to be able to serve those customers. I can't think of any instances where we would automatically load something for a cable that's not getting out there.

MR. SRINIVASA: Let's say you started out with 600 pairs and tapered down at

the end 100 pairs. All those 100 pairs were beyond 18,000 feet. When you install load coils, you have to install the first one at 3,000 feet, 6,000 feet, 6,000 feet spacing, and the last one H88 -- Is that what you use?

MR. WELCH: It's H88 loading. Correct.

MR. SRINIVASA: So you have to use certain spacing. That means those 100 pairs have to have load coils all the way back up to the central office.

MR. WELCH: Correct.

MR. SRINIVASA: Say, for example, in addition to those 100 pairs, if you had some other 50 pair or you changed it for some reason, you moved one of those pairs to somebody else in the distribution interface or somewhere, do you go back and remove all of the load coils, or what do you do?

MR. WELCH: Again, if we're doing -- say, you had a cable, a 200 pair cable that went out beyond 18,000 feet and you decided to use a 100 pair of that cable at 15,000 thousand feet, okay, but we had originally loaded the entire cable all the way out, no, we

wouldn't proactively send our technicians back because the load coils don't negatively impact the POTS service if they're in there.

MR. SRINIVASA: Okay.

MR. WELCH: Again, we wouldn't send technicians out in the field to do work. We have other things we need them to do to help provision service and to place new cables and do the things that we need, and it's not impacting the service that we're trying to provide. So if for some reason you tapered the cable back, no, the answer to that is no, we wouldn't just for no reason at all send a technician out and open up those splices and remove the loads.

MR. SRINIVASA: If an ISDN service is requested by one of those, if you need to remove that -- you know, if you need to put a line extender to go beyond 18,000 feet, you still have to remove the load coils on those.

MR. WELCH: That's correct.

MR. SRINIVASA: So you would only remove load coils on those pairs? Again, engineering judgment would allow the engineer -- he would probably look at it and say, "If I know this cable has been cut off," then, you know,

good engineering judgment would say, yes, he could go in and remove the loads on cables that he didn't have a forecast for service that required that."

I agree with Jo. It's important to note that when you are talking about deloading the cable, it's the prep work associated with getting into the cable that takes the highest percentage of the time. I mean, that's, you know, in a four-hour per load, that's going to be the largest percentage of the work. Actually going in and removing individual loads on one cable versus multiple cables is a slightly incremental cost.

MR. SRINIVASA: Okay.

MS. GENTRY: Yes, I was --

MR. SRINIVASA: Their practice is you know --

MS. GENTRY: Yes, I have a better sense of what their working practice is. Thank you.

MR. MASON: Okay. Well, looking at the issues list, since the answer is that it's up to engineering -- to the individual, it looks like we skip down to a few, unless you

want to go over those.

MS. GENTRY: Let's just clarify on B. When they do -- someone has determined it's appropriate to take off all the load coils even though the initiated reason he went out was for a specific order, do they update all their records in that binder group that they've deloaded? Do they go through to the LFACS database through whatever means and reflect those changes throughout?

MR. WELCH: If the engineer decided to remove additional loads, he would have to do a job, and that job would be what drives the work out in the field. So that job is going to then be handed over to his records clerk, and the records clerk will put that information into the databases. That's just day-to-day. Engineers do jobs. They give it to their clerks. The clerks update the databases.

MR. SIEGEL: But in this case the engineer will have done work beyond what's on the job.

MR. WELCH: No, sir. That's what I'm saying. The job itself is the entire job. If it's to remove one load coil, that's the job.

If he decides that although the request was only for one and he removes 10, 10 is still the job. If he only put one on the job, the person in the field would only remove that one. So the engineer has to issue the job to drive the work that actually occurs in the field. And then while it's being done in the field, it also goes to the records clerk who then updates the databases so it should stay in synch.

MS. GENTRY: So it's not a field technician subjective decision. He only decides -- the engineer that was back at the office, so to speak, who determined what needed to be done, he just follows that instruction down the line. If they said do ten, he does ten. If they say do one, he does one. Correct?

MR. WELCH: I'd say that's -- that's what our technicians better be doing. Yeah.

MR. SRINIVASA: Okay.

MS. GENTRY: And then I think we're down to the E, which is something that I've brought up before. And let me just say that SBC has formed a loop qual team that's -- that has CLEC representation and SBC

representation. We meet every Friday via conference call.

It's a good place to bring questions. Unfortunately, it takes weeks to get answers. So I know it's a process, but what I've asked every team that I attend, which are dozens a week within SBC, I'm asking people to help support the person that chairs that team. He doesn't have enough SBC people behind him to provide him answers.

So with that said, that's why some things come back here because they aren't answered in a manner -- and so we can debate that or whatever, but the point is that it's a nice team. It's a good place to bring questions except they don't get answered very quickly. Or he gets a technician from South Texas on the line and he tells us his local practice. That's really nice to know, but that doesn't tell me what SBC does and that doesn't tell me about the whole state of Texas.

I need to be sure he is addressing SBC policy, which you should have no issues that are Texas unique unless you've identified them that way. When you're speaking, I assume you're

speaking SBC throughout. And so a South Texas engineer who speaks his local practice doesn't help me.

So that's where some of my questions come from. Let me go to like E. Is SBC working on a process to expedite when the information is incorrect? I believe you remember I brought that up before here. I go into the loop qual. I go into it -- and I'm not going into distribution area. I'm going into LFACS or I'm going into manual. So go with the one that I go into LFACS. That's your database today.

I take your information at face value, and I submit my order accordingly. On due date we find out there's a load coil. Let's take the very simplest example. Is SBC in a position that they will work with me to try to expedite that order so the due date is no longer than it would have been when I initially submitted my order? And I'm talking about UNE loops. We're not talking line sharing. I have a five-day interval in Texas for nonconditioning. I have a ten-day interval for conditioning. On Day 5, on due date, we find out there is a load coil. And it is SBC that can find out there is a load